

Proceeding: In the Matter of 1998 Biennial Regulatory Review -- Amendment of Part of the ☒ Record 1 of 1

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Comments on Proposed Changes to FCC Part 97

These comments are in support of the FCC's proposed changes concerning the Amateur Radio Service. Overall, the complexity of the licensing system should be reduced while maintaining some incentives for increased knowledge of the radio art. Also, the licensing requirements should reduce the emphasis on the ability to receive Morse code reflecting the changes in technology that have occurred over the past couple of decades.

1. The Novice License is clearly obsolete as demonstrated by the low number of people entering the Amateur Radio Service via this means. Clearly, the Technician license is the preferred entry point. The Novice license should be eliminated, with existing licenses phased out over time. A reasonable approach would be to grant no renewals of Novice licenses after 5 years from the date of the rule change. This would force existing Novice licensees to upgrade to General Class (assuming that the Technician Plus license is eliminated) or lose all operating privileges.

2. The elimination of the Novice license and Technician Plus license allows for the correction of a problem with the Technician license exam. Presently, a Technician license applicant must pass the Novice written test (Element 2) and the Technician written test (Element 3A). Many of the questions in Element 2 relate to the high frequency privileges of the Novice license and are irrelevant for the Technician license. A new exam (probably a revised combination of Elements 2 and 3A) would replace the existing written exams.

3. The FCC asked for comment on the Morse code requirement for the Amateur Radio Service. Since under the proposal, the General class license would be the entry license for high frequency (HF) privileges, the Morse code requirement should be reduced to 5 WPM. This is consistent with the principle that Morse code is still a useful skill but less important as technology advances. Note that this means that an existing Novice licensee could upgrade to General by passing a written exam (probably Elements 3A and 3B or their replacement).

4. The Morse code requirement for the Extra class license should be reduced to 13 WPM. This supports the idea that the knowledge of Morse code is dropping in value and simplifies the licensing and testing in amateur radio. Only two levels of Morse code test would be required (5 WPM and 13 WPM).

5. The FCC did not specifically mention the issue of memorization of the question pool by applicants. The finite nature of the question pool for all exam elements leaves the possibility that applicants can pass the exam by simply memorizing the answers to the question pool. I have encountered licensed radio amateurs that have passed the exam using this method. The FCC should investigate the existing science behind human memory capacity and increase the size of the question pool so that very few people are capable of memorizing the entire pool. In particular, questions that have numerical answers can be easily replicated with varying parameters so that the answer can not be memorized. Such an action would go far in restoring the integrity of the examination process.

6. The FCC should be very cautious about giving VECs additional flexibility in generating written exams. This has the potential for inconsistent testing standards being used at different exam sessions. Similarly, the FCC should specify exactly how the Morse code exam is to be administered, so that testing

standards are consistent.

In closing, I point out that I hold an Amateur Extra license, so I will not personally benefit from the proposed changes in license requirements. However, I think these changes are positive for the Amateur Radio Service.

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